

1 William Turley, Esq. (122408)
David Mara, Esq. (230498)
2 Jamie Serb, Esq. (289601)
THE TURLEY LAW FIRM, APLC
3 7428 Trade Street
4 San Diego, California 92101
Telephone: (619) 234-2833
5 Facsimile: (619) 234-4048

6 Attorneys for GEORGE ZAMUDIO,
on behalf of himself, all others similarly situated,
7 and on behalf of the general public.

8 **UNITED STATES DISTRICT COURT**
9
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 GEORGE ZAMUDIO on behalf of
12 himself, all others similarly situated,
13 and on behalf of the general public,

14 Plaintiffs,

15 v.

16 AMERIPRIDE SERVICES, INC.; and
DOES 1-100,

17 Defendants.
18

Case No. 4:16-CV-02469-JSW

**JOINT STIPULATION REQUESTING
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE,
EXTENSION OF CURRENT DEADLINE
TO CONDUCT THE PARTIES' RULE
26(F) CONFERENCE AND TO FILE THE
CASE MANAGEMENT STATEMENT**

19
20 **THIS STIPULATION** is hereby entered into by and between Plaintiff George Zamudio
21 and Defendant AmeriPride Services Inc. ("AmeriPride"):

22 **RECITALS**

23 **WHEREAS**, the Court issued an Order on May 17, 2016 requiring the parties to meet
24 and confer pursuant to Federal Rule of Civil Procedure 26(f) and to file a joint case management
25 statement by August 5, 2016. (dkt. 9);
26
27
28

1 **WHEREAS**, the parties communicated on several occasions throughout May and June
2 2016, eventually agreeing to pursue early mediation;

3 **WHEREAS**, the Parties have scheduled a mediation with mediator Robert Kaplan for
4 October 25, 2016;

5 **WHEREAS**, the parties do not seek this continuance for purposes of delay, but, rather, to
6 seek a potential early resolution of the claims asserted;

7 **NOW, THEREFORE**, the parties hereby stipulate to, and request that the Court order
8 that the Case Management Conference set for August 12, 2016 at 11:00 a.m. in Courtroom 5, the
9 parties' deadline to meet and confer pursuant to Federal Rule of Civil Procedure 26(f), and their
10 deadline to file a joint case management statement shall be extended at least five months, to
11 November 18, 2016.

12
13 **IT IS SO STIPULATED.**

14
15 Dated: July 12, 2016

THE TURLEY LAW FIRM, APLC

16
17 By: /s/ William Turley
18 William Turley
19 Attorneys for Plaintiffs

20 Dated: July 12, 2016

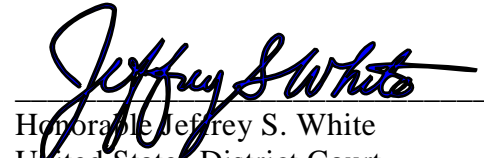
DUANE MORRIS LLP

21
22 By: /s/ Julie Vogelzang
23 Julie Vogelzang
24 Attorneys for Defendant
25
26
27
28

~~[PROPOSED]~~ ORDER

Having considered the Joint Stipulation submitted by the Parties, and for good cause appearing therefore, **IT IS SO ORDERED** that the Case Management Conference is continued until December 2, 2016 at 11:00 a.m./~~p.m.~~. The Parties shall meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and file their joint case management statement seven days before the scheduled Case Management Conference.

Dated: July 13, 2016



Honorable Jeffrey S. White
United States District Court
Northern District